

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

PAMELA G. CAPPETTA

Plaintiff,

v.

GC SERVICES, LP

Defendant.

Civil Action
No. 3:08cv288

DECLARATION OF DR. MARTHA L. KARAM

I, Dr. Martha L. Karam, an adult individual, depose upon my oath and declare the following to be true and correct:

1. My name is Dr. Martha L. Karam. I am over 18 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are true and correct.
2. I am in receipt of a federal subpoena directed to me and which calls for the production of certain marriage counseling records in my possession which relate to Pamela Cappetta.
3. I provided marriage counseling services to Pamela Cappetta in 2006. I provided no medical or psychiatric services to Pamela Cappetta, nor have I ever prescribed any medication for her.
4. In these marriage counseling sessions, no mention was made of an American Express account, nor did Pamela Cappetta discuss any issues which related to any debt collector, including Defendant GC Services.
5. Having now reviewed Plaintiff's Motion to Quash and this Court's memorandum opinion of February 23, 2009, it is my professional opinion that the records in my possession are irrelevant to the instant litigation, and bear no relation to damages she alleges to have suffered by virtue of GC Services' contacts with her, which appear to have occurred for the first time approximately one year after I met with her.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge, and belief.


Dr. Martha L. Karam, Ph.D.